

EXHIBIT A

Proposed Order

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF EXETER HOLDING, LTD.,

Plaintiff,

v.

LINDA HALTMAN, et al.,

Defendants.

Case No. 13-cv-05475 – JS-AKT

**ORDER GRANTING MOTION TO COMPEL
PAYMENT OF MEDIATION FEES AND EXPENSES**

Upon consideration of the letter motion (the “**Motion**”) submitted by Melanie L. Cyganowski, as mediator (the “**Mediator**”) in the above-captioned case, to compel payment of the Mediating Defendants’¹ share of the fees and expenses incurred in connection with the mediation; and the Court having jurisdiction pursuant to 28 U.S.C. §1334 to consider the Motion and the relief requested therein; and venue being proper in this Court pursuant to 28 U.S.C. § 1409; and no objection or other responses having been filed that have not been overruled, withdrawn or otherwise resolved; and the Court having found that the Mediating Defendants have failed to pay in full their share of the Mediator’s fees and expenses; and after due deliberation and sufficient cause appearing therefore, it is hereby

ORDERED that the relief sought in the Motion is granted; and it is further

ORDERED that the Arnold and Sondra Defendants are hereby directed to pay the Mediator the sum of \$17,847.23, plus an amount not to exceed \$2,000 for the reasonable fees and expenses incurred by the Mediator in preparing and prosecuting the Motion, no later than the fifth (5th) business day following the entry of this Order; and it is further

¹ Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion.

ORDERED that the LMBK Defendants are hereby directed to pay the Mediator the sum of \$9,847.23, plus an amount not to exceed \$2,000 for the reasonable fees and expenses incurred by the Mediator in preparing and prosecuting the Motion, no later than the fifth (5th) business day following the entry of this Order; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.